

NOV 03 1995

Mr. Christopher D. Powell
Project Director
Environmental Strategies Corporation
Four Penn Center West, Suite 315
Pittsburgh, PA 15276

Re: Freedom of Information Act Request
Ashland Chemical-Dallas EPA ID NO. TXD980624829
06-RIN-02155-95
Ashland Chemical-Houston EPA ID NO. TXD980629729
06-RIN-02156-95

Dear Mr. Powell:

In your letter, dated October 20, 1995, you requested notification of the existence of files in the U.S. Environmental Protection Agency's (EPA) Region 6 office. We have located files on the types of waste generated. These files have been copied and are being sent to your office.

You may wish to contact the Texas Natural Resource Conservation Commission (TNRCC) and request the same information that you made to our office. They can be reached in Austin, Texas, at (512) 239-6595 and request Kari Bourland. Their address is as follows:

Texas Natural Resource Conservation Commission
Industrial & Hazardous Waste Division
P.O. Box 13087
Austin, Texas 78711-3087

If you or members of your staff have questions or need additional information, please contact Jon G. Rinehart of my staff (214) 665-6789.

Sincerely yours,

Bill Gallagher, Chief
Oklahoma/Texas *Sec.*

Enclosure
06-RIN-02156-95 02155 RINEHART 10-23-95
banks

6pd-02
[Signature]
11/2

RECORD OF COMMUNICATION	TYPE: PHONE
To: JON G. RINEHART; X - 6789	From: GERARDO ACOSTA Texas Section (6EN-HT) RCRA Enforcement
SUBJECT: FREEDOM OF INFORMATION ACT (FOIA) REQUEST REGARDING ASHLAND CHEMICAL COMPANY.	DATE: 10/26/95 TIME: 2:05 pm
SUMMARY OF COMMUNICATION: I called Jon G. Rinehart (6PD-O) regarding a FOIA request for files the related to Ashland Chemical Company, located at 3636 Dan Morton DR, Dallas, Texas. I ask Mr. Rinehart if he had the same FOIA request for the same company, and he said he did. He also said he has already made the copies from the RCRA files and will send them to the requester.	
CONCLUSIONS, ACTIONS TAKEN OR REQUIRED: None.	
INFORMATION COPIES TO: FOIA FILE	

Control# 6RIN-95-2155-ENH
Received 10/24/95

Due 11/23/95

Originator Teresa P. Cooks
From POWELL, Christopher D.

< Subject >

Environmental Strategies Corporation

< Division Comments >

6EN-W (lead)

Assigned to Branch 6EN-H 10/24/95
Compliance Assurance - Hazardous Wa

Staff assigned:

Extension request received:	/	/
Granted:	/	/
Notified:	/	/
Denial:	/	/
Notified:	/	/

Branch completed on:	/	/
Division completed on:	/	/
Cost:		0.00

< Branch and Section Comments >

Distribution:

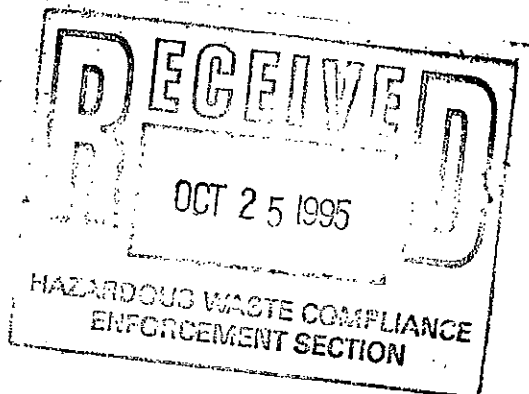
6EN-A: Compliance Assurance - Air/Toxics & Insp
6EN-H: Compliance Assurance - Hazardous Waste E
6EN-W: Compliance Assurance - Water Enforcement

HT only

RECEIVED

OCT 25 1995

RCRA ENFORCEMENT
TEXAS SECTION



**ENVIRONMENTAL STRATEGIES CORPORATION**

Four Penn Center West • Suite 315 • Pittsburgh, Pennsylvania 15276 • (412) 787-5100 • FAX (412) 787-8065

October 20, 1995

Jerva Durham
U.S. EPA, Region VI
Fountain Place
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

RECEIVED

OCT 20 1995

EPA Region VI
Freedom of Information OfficerRe: Freedom of Information Act Request

Under the Freedom of Information Act, 5 USC 552, Environmental Strategies Corporation (ESC) is requesting notification of whether files exist at your office for the current and former owners of the property located at:

3636 Dan Morton Drive
Dallas, TX 75236

EPA ID No.: TXD 980 324 829

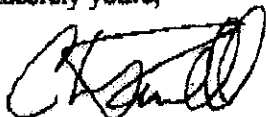
#1 This property is currently owned by Ashland Chemical Company and was formerly owned and operated by Unocal Chemicals Distribution (Union Oil Company of California). The types of files we are interested in include, but are not limited to, the following.

- 6EN
6PD
6WQ
6SF
11-3
2155
- submissions to the agency summarizing expansion or renovation activities
 - permits
 - design drawings
 - types of products stored at the facility
 - air emissions calculations, permits, and correspondence
 - air permit applications
 - NEDES permit for new discharges
 - types of waste generated
 - building and construction permits
 - notifications of spills and releases
 - spill reports
 - notices of violation or other agency actions (consent orders, administrative orders)
 - investigation or remediation work plans
 - remedial investigation/feasibility studies
 - RCRA facility assessment
 - RCRA facility investigations
 - approval letters
 - investigation or remediation reports
 - closure plans
 - underground storage tank registrations and investigations

files exist, ESC will need to visit your office to review them. Because of the tight time constraints on this project, please let us know by October 27, 1995, whether files for the facility exist at your office. You can contact me by telephone at (412) 787-5100 or by facsimile at (412) 787-8065. I understand that fees may be charged to cover the cost of the search.

Should you have any questions or require additional information, please do not hesitate to contact me. Thank you for your assistance.

Sincerely yours,



Christopher D. Powell
Project Director

CDP:mem



ENVIRONMENTAL STRATEGIES CORPORATION

Four Penn Center West • Suite 315 • Pittsburgh, Pennsylvania 15276 • (412) 787-5100 • FAX (412) 787-8065

October 20, 1995

Jerva Durham
U.S. EPA, Region VI
Fountain Place
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7010 Mykawa
Houston, TX 77033

EPA ID No.: TXD 980 629 729

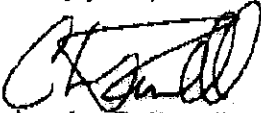
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~~Should you have any questions or require additional information, please do not hesitate to contact me.~~
Thank you for your assistance.

Sincerely yours,



Christopher D. Powell
Project Director

CDP:mem



FACSIMILE TRANSMITTAL
U.S.EPA-REGION 6
MULTIMEDIA PLANNING & PERMITTING DIVISION
1445 ROSS AVENUE
DALLAS, TEXAS 75202-2733

TO: Christopher Powell - Environmental Strategies		
FAX NUMBER: 412-787-8065		PHONE NUMBER: 412-787-5100
FROM: Jan Rinehart		
PHONE: 214-665-6789		MAIL CODE: 6PD-0
OFFICE: OK/TX RCRA Permits Section		
DATE: Nov. 1, 1995		PAGES INCLUDING COVER SHEET: 13
PLEASE NUMBER ALL PAGES		
INFORMATION FOR SENDING FACSIMILE MESSAGES		
EQUIPMENT:	FACSIMILE NUMBER:	VERIFICATION NUMBER:
PANAFAX UF-620	(214) 665-6762	

COMMENTS:

From: Dorothy Whaley
To: R6HAZRD2(RINEHART-JON)
Date: Monday, October 30, 1995 1:10 pm
Subject: Control RIN-02156 RIN-02155 -Reply

NO, I HAVE WRITTEN NO RESPONSE LETTERS.

This facility has been modified in the Resource Conservation and Recovery Information System (RCRIS) to a Large Quantity Generator (LQG). This modification to RCRIS was done April 29, 1995 per the instruction of the State of Texas (TNRCC). The LQG modification was based on responses TNRCC received to letters regarding their annual report. Due to the response received from this company, they have been coded as a LQG. All supporting documentation can be found in TNRCC's central records.

JUN 05 1992

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

**EPA**

Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Notification

☒B. Subsequent Notification
(complete item C)

C. Installation's EPA ID Number

TXD980624829

II. Name of Installation (Include company and specific site name)

ASHLAND CHEMICAL INC.

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

3636 DAN MORTON DRIVE

Street (continued)

City or Town

DALLAS

State

ZIP Code

TX 75236 -

County Code

County Name

DALLAS

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

SAME

City or Town

State

ZIP Code

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

(first)

OLASIN

OLASIN

Job Title

Phone Number (area code and number)

ENVIRONMENT. ENG 614-889-3065

VI. Installation Contact Address (See Instructions)

A. Contact Address
Location Mailing

B. Street or P.O. Box

☒☐

City or Town

State

ZIP Code

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

ASHLAND CHEMICAL INC.

Street, P.O. Box, or Route Number

5200 BLAZER PARKWAY

City or Town

State

ZIP Code

DUBLIN OH 43017 -

Phone Number (area code and number)

B. Land Type

C. Owner Type

D. Change of Owner Indicator

(Date Changed)

614-889-3065

P

P

Yes

No

X

Month

Day

Year

02

28

92

1D - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to Instructions.)

A. Hazardous Waste Activity

1. Generator (See Instructions)
- ☒ a. Greater than 1000 kg/mo (2,200 lbs.)
- ☐ b. 100 to 1000 kg/mo (220 - 2,200 lbs.)
- ☐ c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
- ☐ a. For own waste only
- ☐ b. For commercial purposes
- Mode of Transportation
- ☐ 1. Air
- ☐ 2. Rail
- ☐ 3. Highway
- ☐ 4. Water
- ☐ 5. Other - specify _____
3. Treater, Storer, Disposer (at installation)
Note: A permit is required for this activity; see Instructions
- ☐ a. Hazardous Waste Fuel
- ☐ b. Generator Marketing to Burner
- ☐ c. Other Marketers
- ☐ d. Burner - Indicate device(s)
- Type of Combustion Device
- ☐ 1. Utility Boiler
- ☐ 2. Industrial Boiler
- ☐ 3. Industrial Furnace
- ☐ e. Underground Injection Control

B. Used Oil Fuel Activities

1. Off-Specification Used Oil Fuel
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketers
- ☐ c. Burner - Indicate device(s)
- Type of Combustion Device
- ☐ 1. Utility Boiler
- ☐ 2. Industrial Boiler
- ☐ 3. Industrial Furnace
2. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification
- ☐

IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001) ☒
2. Corrosive (D002) ☐
3. Reactive (D003) ☐
4. Toxicity Characteristic (D000) ☐
- (List specific EPA hazardous waste number(s) for the Toxicity Characteristic contaminant(s))

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See Instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring an I.D. number. See Instructions.)

1	2	3	4	5	6

Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature

William C. Olasin

Name and Official Title (type or print)

WILLIAM C. OLASIN ENV. ENG.

Date Signed

5-12-92

Comments

PREVIOUSLY UNOCAL

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

DATA CHANGES

EPA IDENTIFICATION NUMBER/C101=12

TXD980624829

TWC #/C116=6

PREPARER

el

DATE

3/18/92

Facility Name/C104=40

Mailing Address/C106=30

City/C107=25

Facility Contact Person/C105=30

Location Address/C110=30

City/C111=25

Owner's Name/C1503=40

ASHLAND CHEMICAL INC

GEN TRN TSD UIC

C1105

C305

Other

Other

Telephone/C113=10

Waste Codes to be added/C2701

Waste Codes to be deleted/C2701

Process Codes- Add - Delete - Change

C1801=3

C1802=13

C1803=1

C1804=1

C1801=3

C1802=13

C1803=1

C1804=1

C1801=3

C1802=13

C1803=1

C1804=1

Other Coding as necessary

Entered by: DA

Date Entered: 4.21.92

QC:

File Code:



Environmental, Health & Safety

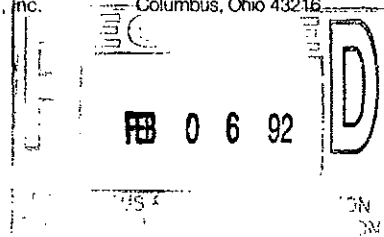
G. W. Hammer
Vice President
(614) 889-3052

January 24, 1992

Ms. Joy McGee
Hazardous & Solid Waste Division
Evaluation Section Notification Unit
P.O. Box 13087
Capitol Station
Austin, TX 78711

Ashland Chemical, Inc.
Subsidiary of
Ashland Oil, Inc.

Address Reply:
P.O. Box 2219
Columbus, Ohio 43216



**CERTIFIED MAIL RETURN
RECEIPT REQUESTED**

Dear Ms. McGee:

Re: Unocal Corporation/Union Oil
Company of California
3636 Dan Morton Road
Dallas, TX 75236
Permit category: Haz. Waste ID
ID No.: 74371 (9806-24-829)

Ashland Chemical, Inc. (Ashland) reached an agreement in principle on November 8, 1991 with Union Oil Company of California (Unocal), a subsidiary of Unocal Corporation, for Ashland to acquire most of Unocal's chemical distribution business. The ownership of the referenced facility will be transferred to Ashland upon the closing of a final agreement, which is expected to occur in January or February of 1992.

The referenced facility has an active permit issued by your agency or a permit application filed. The permit condition or your agency's regulation requires Ashland to notify your agency of the expected change of the ownership or to initiate a permit transfer approval process prior to the transfer of the ownership.

This letter is to fulfill the requirement of notification of the impending change of the ownership of the referenced facility and to request a new Generator's ID number for the facility. Upon consummation of the transaction we will inform you by letter of the closing date. If the change of ID number requires an approval, please advise us the steps we need to take. If you have any questions or need further clarification on this matter, please contact me at 614-889-3065. Thank you for your attention to this matter.

Sincerely,

William C. Olatin
William C. Olatin

Environmental Engineer

Headquarters
5200 Blazer Parkway
Dublin, Ohio 43017

Cable Address: Aroplaz OH
Telex: 245385
Answerback: ASHCHEM
Fax: (614) 793-6080



Ashland Chemical's
Commitment to
Quality and Productivity

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1985 (cont.)

This report is for the calendar year ending December 31, 1985

GENERATOR'S NAME: UNOCAL CHEMICALS DIV, UNOCAL CORP
3636 DAN MORTON DR, DALLAS, TEXAS 75236

Date rec'd: _____ Rec'd by: _____

XV. GENERATOR'S EPA I.D. NO.

TAC

6	T	X	1	9	8	0	6	2	4	8	2	9	1	
1	2											13	14	15

XVI. WASTE MINIMIZATION (narrative description)

THE UNOCAL CORPORATION HAS DEVELOPED THE FOLLOWING PROGRAM OF WASTE MINIMIZATION.

1. SCRAP SOLVENTS ARE BEING SEGREGATED INTO SALABLE AND WASTE FRACTIONS.
2. MAJOR SPILL CONTAINMENT AND SURFACING PROJECTS ARE BEING IMPLEMENTED TO REDUCE THE AMOUNT OF CONTAMINATED SOIL GENERATED FROM ACCIDENTAL SPILLAGE.
3. TECHNOLOGY REVIEWS ARE BEING PERFORMED FOR VOLUME REDUCTION AND OIL RECOVERY.
4. THE CORPORATION IS PARTICIPATING IN TRADE ASSOCIATION STUDIES OF THE FOLLOWING:
 - A. REDUCTION OF VOLUME AND TOXICITY OF REFINING AND PRODUCTION WASTES.
 - B. HAZARDOUS WASTE AND CONTAMINATED SOIL TREATMENT.
 - C. PESTICIDE CONTAMINATED RINSE WATER TREATMENT.
 - D. ALTERNATIVE TECHNOLOGIES FOR FREE LIQUIDS.
5. DESCRIPTION OF CHANGES IN VOLUME AND TOXICITY OF WASTE:

ALL PRODUCT ACCUMULATED HAS BEEN SOLD AS DOWN GRADED SOLVENT.
NONE HAS HAD TO BE DISPOSED OF AS HAZARDOUS WASTE.



TX 7-98-062-4829

Union Chemicals Division: Petrochemical Group

Union Oil Company of California

General Office: 1345 N. Meacham Road

Schaumburg, Illinois 60196

Telephone: (312) 885-5455



January 5, 1981

A. S. Hoyer
Vice President,
Supply & Distribution

United States Environmental
Protection Agency
Attention: Office of the
Administrator

Re: Delegation of Authority

To Whom It May Concern:

Authorization is hereby delegated to the position of plant manager of the Union Chemicals Division, Dallas, Texas, LCL Plant, 3636 Dan Morton Drive, Dallas, Texas to sign on behalf of the company, all reports required in connection with the Federal Environmental Protection Agency Consolidated Permit Regulations.

Respectfully yours,

A handwritten signature in cursive script, appearing to read "A. S. Hoyer".

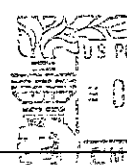
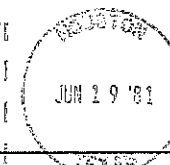
Vice President
Union Chemicals Division
Union Oil of California

EPA Region IV
ATT: 6AEP
1201 Elm Street
First International Bldg
Dallas, Texas 75270

TIFICATION OF
OUS WASTE ACTIVITY.

DETACH ALONG THIS LINE

111111
111111
111111
111111



METER
8200305



PLEASE PLACE LABEL IN THIS SPACE

FOR OFFICIAL USE ONLY

COMMENTS

C															C														
15															16														
INSTALLATION'S EPA I.D. NUMBER															APPROVED					DATE RECEIVED (yr., mo., & day)									
S F 7 X D 9 8 0 6 2 4 8 2 9 2 1															T/A C					3 1 0 6 1 9									
1 2															13 14 15					16 17 18 19									

NAME OF INSTALLATION

Union Oil Co of Calif-Union Chemicals Division

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

E																										
3	3	6	3	6	Dan Morton Drive																45					
15	16	CITY OR TOWN																		ST.	ZIP CODE					
G	4	Dallas																		Tx		7	5	2	3	6
15	16																			40	41	42	47	51		

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

[illegible]

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.) _____

[illegible]

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

[illegible]

B. TYPE OF OWNERSHIP
(enter the appropriate letter into box)

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

F = FEDERAL
M = NON-FEDERAL

X A. GENERATION

☐ B. TRANSPORTATION (complete item VII)☐ C. TREAT/STORE/DISPOSE

☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR

B. RAIL

☐ C. HIGHWAY

☐ D. WATER

☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

C. INSTALLATION'S EPA I.D. NO.

A. FIRST NOTIFICATION

☐ B. SUBSEQUENT NOTIFICATION (complete item C)

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

5	W	T	X	D	9	8	0	6	2	4	8	2	9	2	1
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
U 0 0 2	U 0 3 1	U 1 0 7	U 1 1 2	U 1 4 0	U 1 5 4
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
U 1 5 9	U 1 6 1	U 2 1 0	U 2 2 0	U 2 2 6	U 2 2 8
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
U 2 3 9					
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

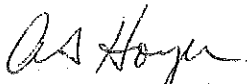
☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)
X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE



NAME & OFFICIAL TITLE (type or print)

A. S. Hoyer
V.P., Supply & Distribution

DATE SIGNED

6/12/81